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Via Electronic Filing

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street, SW
Washington, DC 20554

Re: *Ex Parte* Notice: *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks* – IB Docket No. 13-213

Dear Ms. Dortch:

On November 10, 2016, Tim Taylor, Vice President of Finance, Business Operations & Strategy, for Globalstar, Inc. (“Globalstar”), Steve Berman of Lawler, Metzger, Keeney & Logan, LLC, and I met separately with Johanna Thomas, Legal Advisor to Commissioner Jessica Rosenworcel, and Brendan Carr, Legal Advisor to Commissioner Ajit Pai, regarding the Commission’s proposed rules in the above-captioned proceeding.¹ On November 14, 2016, L. Barbee Ponder IV, General Counsel & Vice President, Regulatory Affairs, for Globalstar, Mr. Taylor, Mr. Berman, and I met with Daudeline Meme, Legal Advisor to Commissioner Mignon Clyburn, regarding these proposed rules. In these meetings, we discussed issues raised in Globalstar’s November 9, 2016 *ex parte* filing in this proceeding, which presented Globalstar’s revised proposal for terrestrial services in the 2.4 GHz band.² This proposal narrows Globalstar’s low-power terrestrial rights to its own licensed mobile satellite service (“MSS”) spectrum at 2483.5-2495 MHz and requests that the Commission adopt a subset of the rules proposed in the *NPRM*. Under this proposed framework, Globalstar would use its 11.5 megahertz of licensed spectrum for low-power terrestrial broadband services, including a variety of voice, data, and text applications.

As we described in these meetings, Globalstar’s revised proposal should resolve all remaining interference-related concerns in this proceeding as well as policy issues related to use of the 10.5 megahertz of unlicensed ISM spectrum. This proposal should eliminate objections

¹ *Terrestrial Use of the 2473-2495 MHz Band for Low-Power Mobile Broadband Networks; Amendments to Rules for the Ancillary Terrestrial Component of Mobile Satellite Service Systems*, Notice of Proposed Rulemaking, 28 FCC Rcd 15351 (2013) (“*NPRM*”).

² Letter from L. Barbee Ponder, Globalstar, Inc., to Marlene H. Dortch, Secretary, FCC, IB Docket No. 13-213 (Nov. 9, 2016).

relating to Globalstar's proposed operations below 2483.5 MHz and alleged detrimental interference to Wi-Fi systems and Bluetooth operations in the unlicensed ISM band. We also made clear that Globalstar's low-power terrestrial service at 2483.5-2495 MHz would be subject to the same interference obligations that apply today to terrestrial operations under the Commission's Part 25 rules (and that the Commission proposed in the *NPRM*). Globalstar would be required to protect other licensed systems from harmful interference, and its low-power terrestrial facilities would not be entitled to interference protection from other authorized operations. Finally, Globalstar's revised proposal includes the same gating criteria as proposed in the *NPRM*.

Accordingly, Globalstar urges the Commission to adopt a subset of the Part 25 amendments proposed in the *NPRM* to permit Globalstar to provide low-power terrestrial operations in the 2483.5-2495 MHz band. More than three years after release of the *NPRM*, the Commission should enable Globalstar to make more intensive use of its licensed spectrum and improve the quality of wireless broadband for American consumers.

Pursuant to section 1.1206(b)(2) of the Commission's rules, 47 C.F.R. § 1.1206(b)(2), this *ex parte* notification is being filed electronically for inclusion in the public record of the above-referenced proceeding.

Respectfully submitted,

/s/ Regina M. Keeney
Regina M. Keeney

cc: Johanna Thomas
Brendan Carr
Daudeline Meme